

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	No. 4:23-cr-00578-AGF
	)	
v.	)	
	)	
CONNIE BOBO,	)	
	)	
Defendant.	)	

**THE UNITED STATES OF AMERICA’S SUPPLEMENT TO THE  
MOTION TO REVOKE BOND**

The United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Derek J. Wiseman, Assistant United States Attorney for said District, files this Supplement to the Motion to Revoke Bond. In support, the United States provides the following.

1. In addition to the previously articulated, independently sufficient reasons to order Defendant’s bond revoked, Defendant recently demonstrated that such an order is necessary by resisting arrest during the FBI’s execution of the arrest warrant.

2. On Wednesday, August 28, 2024, when FBI agents went to execute the arrest warrant signed by this Court, Defendant refused to exit her house for nearly two hours—despite the repeated commands from the FBI that she do so. During the lengthy process of attempting to arrest Defendant, she knew full well that the FBI was at her house to execute the arrest warrant. The FBI agents on the scene—at her front door—repeatedly knocked, announced, and demanded that she surrender herself, the agents called her cellphone to make the same demands, and the undersigned communicated with Defendant’s lawyer to tell her to voluntarily surrender. Even after the United States was assured by Defendant’s lawyer that she would surrender, Defendant still

refused to do so. It was not until the FBI agents on the scene that morning began the process of breaching the front door of her residence that Defendant exited her house through a side door and was quickly arrested.

3. Defendant's recent decision to resist a lawful arrest—rather than to voluntarily surrender—is part of the same pattern of conduct that she has displayed throughout this case. From stealing nearly \$20 million dollars that were supposed to go to feeding impoverished children, to obstructing the FBI's criminal investigation, to disregarding express instructions from the Pre-Trial Services Office, to violating the conditions of her release imposed by this Court, Defendant has repeatedly demonstrated a disrespect for the rule of law.

4. Therefore, this Court should revoke Defendant's bond because there is "clear and convincing evidence that [Defendant] has violated [a] condition of release," and Defendant is "unlikely to abide by any condition or combination of conditions of release." *See* 18 U.S.C. 3148(b).

Respectfully submitted,

SAYLER A. FLEMING  
UNITED STATES ATTORNEY

/s/ Derek J. Wiseman  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 31, 2024, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon counsel for the defendant.

/s/ Derek J. Wiseman  
DEREK J. WISEMAN #67257MO  
Assistant United States Attorney